

MATTHEW D. METZGER (SBN 240437)
mmetzger@belvederelegal.com
BELVEDERE LEGAL, PC
1777 Borel Place, Suite 314
San Mateo, CA 94402
Telephone: (415) 513-5980
Facsimile: (415) 513-5985

STUART G. GROSS (SBN 251019)
sgross@grosskleinlaw.com
TIM KLINE (SBN 319227)
tk@grosskleinlaw.com
GROSS & KLEIN LLP
The Embarcadero
Pier 9, Suite 100
San Francisco, CA 94111
t (415) 671-4628
f (415) 480-6688

Attorneys for Creditor,
Dan Clarke

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF SUPPLEMENTAL
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: March 10, 2020

Time: 10:00 a.m.

Ctrm: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom No. 17
San Francisco, CA 94102

Objection Deadline:
March 5, 2020, at 4:00 p.m. (PT)

1
2 Movant Dan Clarke, hereby requests that the Court take Judicial Notice, pursuant to Federal
3 Rule of Evidence 201(b) of the following documents included in Exhibits A – D included in the
4 supporting declaration of Matthew D. Metzger.

5 Pursuant to Federal Rule of Evidence 201, the Court may take judicial notice of
6 “. . . a fact that is not subject to reasonable dispute because it . . . (2) can be accurately and readily
7 determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)
8 (2). Exhibits A – D meet said criteria and are identified as follows:

9 1. **Exhibit A:** a true and correct copy of the July 26, 2019 Order Granting Motion for
10 Summary Judgment in Part and Denying in Part; Denying Motions to Seal; Granting Motion to File
11 Sur-Reply, in the matter *San Francisco Herring Association, et al, Plaintiffs, v. Pacific Gas and*
12 *Electric Company, et al., Defendants*, United States District Court, Northern District of California,
13 Case No. 14-cv-04393-WHO.

14 2. **Exhibit B:** a true and correct copy of the Revised Cal. P.U.C. Sheet No. 43284-E,
15 entitled “Electric Preliminary Statement Part S Hazardous Substance Mechanism”, issued by Robert
16 S. Kenney, PG&E Vice President, Regulatory Affairs, Sheets 1-5 (“Revised Cal. P.U.C. Sheet No.
17 43284-E”), submitted October 31, 2018 and effective November 30, 2018.

18 3. **Exhibit C:** a true and correct copy of the Declaration of Robert C. Doss in Support
19 of Motion for Authorization to Continue Its Hazardous Substance Cleanup, which PG&E filed June
20 6, 2001, *In re Pacific Gas and Electric Company*, a California corporation, United States
21 Bankruptcy Court, Northern District of California, Case No. 01 30923 DM, Dkt No. 802.

22 4. **Exhibit D:** a true and correct copy of the material portion (page 36) of PG&E’s Form
23 10-K for the fiscal year ended December 31, 2016.

24 Dated: February 13, 2020

25 BELVEDERE LEGAL, PC

26 By: /s/ Matthew D. Metzger
27 Matthew D. Metzger
28 Attorneys for Creditor,
Dan Clarke